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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

10 KATHERINE MAYORGA, an individual )  
11 Plaintiff, ) 2:19-cv-00168-JAD- DJA  
12 vs. )  
13 CRISTIANO RONALDO, individually, )  
14 Does I-XX and Roe Corporations I-XX; )  
15 Defendants. )

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF'S FILING OF  
OPPOSITION AND REPLY TO DEFENDANT CRISTIANO RONALDO'S MOTION TO  
DISMISS**

## **First (Amended) Request**

19 The parties through their respective counsel hereby stipulate to extend the time for filing  
20 of Plaintiff's Opposition to Defendant Cristiano Ronaldo's Motion to Dismiss, from August 30,  
21 2019 to September 20, 2019 and the filing of the Defendant's Reply to the Plaintiff's Opposition  
22 to October 11, 2019. This is the first (amended) request for an extension of time to file an  
23 Opposition and Reply to Defendant Cristiano Ronaldo's Motion to Dismiss.  
24

25 Defendant's Motion to Dismiss (ECF 29) was filed on August 16, 2019, with the deadline  
26 for Plaintiff's Opposition being August 30, 2019. On August 22, 2019 the parties submitted their  
27 Stipulation and Order to Stay Discovery and Continue Briefing Schedule (ECF 35). The court  
28

1 rejected that Stipulation on August 26, 2019 (ECF 36) and requested additional information  
2 regarding the reasons for the stipulation to extend time.

3 Good cause exists to set an extended briefing schedule regarding Defendant's Motions.  
4 Plaintiff has requested additional time to respond to both of Defendant's Motions as a result of  
5 her counsel's current caseload and other family related scheduling issues.

6 In particular, Plaintiff's counsel concluded a four-week jury trial in *Peterson v. Medic*  
7 *West Ambulance Inc.* in Department 14 of the Clark County District Court on August 2, 2019;  
8 commenced preparation for the September 9, 2019 homicide trial of *State v. Billingsley*, in  
9 Department 11 of the Clark County District Court; and filed motions so continue trials set to  
10 commence on September 9, 2019 in cases of *Endeavor v. Carlos and Charlie*'s in Department 15  
11 of the Clark County District Court and *Gaspar v. Rohi* in Department 18 of the Clark County  
12 District Court.

13 Additionally, Plaintiff's counsel was informed that his sister was admitted to a hospital  
14 on August 9, 2019, traveled to the state of Florida to care for his sister following her discharge,  
15 and returned to his office on August 19, 2019. On September 3, 2019 the *Endeavor v. Carlos and*  
16 *Charlie*'s trial was continued to September 23, 2019 to provide plaintiff's counsel time to  
17 complete the response to Defendant's Motion to Dismiss in this case. On September 4, 2019 the  
18 *Rohi v. Gaspar* parties settled and the trial of the third-party complaint was continued to  
19 February 10, 2019. On September 5, 2019 the *State v. Billingsley* case was continued to March 2,  
20 2019. Thus, due to the aforementioned personal and professional scheduling conflicts, Plaintiff  
21 requires until September 20, 2019 to oppose Defendant's Motion to Dismiss.

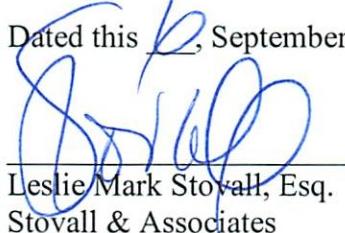
22 Defendant will in turn require additional time to prepare a Reply brief in support of  
23 Defendant's Motion to Dismiss, given that Defendant has also agreed to afford Plaintiff until  
24

1 September 20, 2019 to file her Opposition to Defendant's Motion to Compel Arbitration, which  
2 would initially have been due on August 22, 2019 but under the new briefing schedule, will now  
3 be filed on the same date as the instant Opposition to Defendant's Motion to Dismiss, versus the  
4 staggered deadlines that would have been in place based on the date of the initial filings.  
5

6 Additionally, because the Parties could not agree on language to set-forth an agreement to stay  
7 discovery in this matter, Defendant's Counsel will also be required to file a motion to stay  
8 discovery in the coming weeks. Accordingly, good cause exists to extend the briefing deadlines  
9 for both Parties as follows:

- 10
- 11     • September 20, 2019: Deadline for Plaintiff's Oppositions to Defendant's Motion  
12         to Compel Arbitration and Motion to Dismiss.
  - 13     • October 11, 2019: Deadline for Defendant's Reply briefs in support of  
14         Defendant's Motion to Compel Arbitration and Motion to Dismiss.

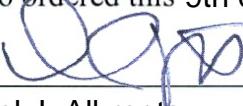
15 Dated this 20, September, 2019

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22 Dated this 6<sup>th</sup>, September, 2019

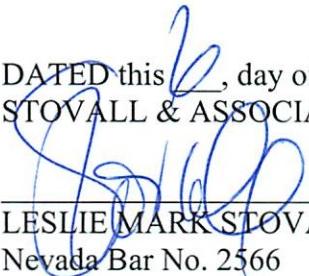
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24 /s/ Kendelee Leascher  
Peter S. Christiansen, Esq.  
25 Kendelee Leascher Works, Esq.  
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1 It is so ordered this 9th day of September, 2019  
2   
3

4 Daniel J. Albregts  
5 United States Magistrate Judge  
6

7 DATED this 9th, day of September, 2019  
8 STOVALL & ASSOCIATES  
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